Office of the Auditor General of Canada

Internal Audit of Document Management Through PROxI Implementation

July 2014

Practice Review and Internal Audit

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Introduction

1. The Office of the Auditor General (the Office) is obliged to respect information management policy objectives of the Treasury Board of Canada Secretariat (the Secretariat) as well as the Directive on Recordkeeping when it comes to corporate information. To meet these requirements, Office personnel must use the Office's electronic document and records management system (EDRMS) consistently, and information is to be easily stored, secured, and made available to support operational and strategic activities. According to the Government of Canada Policy on Information Management, deputy heads are responsible for the following, among other things:

- ensuring that departmental programs and services integrate information management requirements into development, implementation, evaluation, and reporting activities;
- ensuring that decisions and decision-making processes are documented to account for and support the continuity of departmental operations, permit the reconstruction of the evolution of policies and programs, and allow for independent evaluation, audit, and review;
- ensuring that information is shared within and across departments to the greatest extent possible, while respecting security and privacy requirements; and
- establishing, measuring, and reporting on a departmental program or strategy for the improvement of the management of information.

2. The Secretariat's Standard for EDRMS states: "Information resources of business value are strategic assets used across government to support effective decision making and facilitate ongoing operations and the delivery of programs and services. The Directive on Recordkeeping requires departments to establish the mechanisms and tools to support the departmental recordkeeping requirements throughout the information life cycle."

3. As an Officer of Parliament, the Office has special authority to operate independently. At the same time, it must meet important government policy obligations. The Directive on Recordkeeping contains many policy requirements for deputy heads. Departments were supposed to meet these obligations by March 2014, but based on feedback from departments and agencies, the Secretariat revised the date to 31 March 2015 to provide the time needed to implement all the requirements. Departments were expected to obtain an accurate and reliable overview of the current level of recordkeeping maturity, identify recordkeeping gaps and weaknesses, and measure recordkeeping progress over time.

4. To meet these and other policy objectives, the Office has made a significant investment in electronic document management systems. The Office

uses two primary and distinct systems to manage information. TeamMate is specific to audit records and supports the audit process. PROxI is a mission-critical EDRMS that the Office defines as "an integrated suite of tools that will simplify information management, storage, retrieval, and promote the sharing of information across the Office." PROxI was fully deployed in June 2009.

5. The Office received an updated Records Disposition Authority from Library and Archives Canada (LAC) in May 2013. This authority allows the Office to dispose of specific types of information. The authority also requires the Office to properly classify information and record decisions. The Office must continue to track specific types of information—such as information about management and oversight of the Office—and provide it to LAC. This includes senior management decisions outside the scope of a specific audit. PROxI exists to support the management of this type of information.

6. The Office now needs to assess the extent to which it has put its information management/information technology (IM/IT) systems into effect to meet IM policies and regulations in practice. A risk exists that the Office will not meet its many policy obligations. Given this risk, the Office Chief Audit Executive has identified the adoption and implementation of the Office's information management system as a topic for audit this year. This audit focuses on the Office's obligations to meet government information management policies and directives through the use of PROxI. The audit management software, TeamMate, is outside the scope of this audit.

Focus of the audit

7. We examined the information management (IM) governance structure, the PROxI system implementation and gap analysis, IM monitoring, and reporting to senior management during the period of 1 January 2013 to 31 December 2013. More details on the audit objectives, scope, approach, and criteria are in **About the Internal Audit** at the end of this report.

Observations and Recommendations

Monitoring and reporting

8. Effective monitoring of information management (IM) allows an organization to determine whether it knows which documents serve a business purpose, which documents can and should be disposed of, and which documents should be retained due to their enduring value.

9. We conducted a review of available metrics to determine whether the Office has put in place procedures consistent with good practices to monitor the implementation of its electronic document and records management system. We

requested any and all metrics identifying system utilization that could demonstrate that the procedures in place were consistent with good IM practices.

Monitoring is not being done as a repeatable business process

10. We found that monitoring is not being done as a repeatable business process, but rather on an ad hoc or transactional basis. This monitoring is limited to how many documents were saved, which groups saved to PROxI, and similar high-level metrics. We saw no summary or analysis document that would enable a reader to comprehend the data provided. In fact, we were advised that the numbers needed to be interpreted carefully and that someone would have to explain their significance.

11. The Office of the Auditor General IT Security Policy and the Treasury Board of Canada Secretariat (the Secretariat) Policy on Government Security require monitoring to determine whether the departmental security program is effective. In the Office's implementation, employees are permitted to store documents that are classified up to and including Protected B in the PROxI repository. Any repositories other than PROxI have the same information storage requirement. We observed that no monitoring has taken place to ensure that no information above Protected B resides within PROxI or the other repositories that Office employees can currently use.

12. Employees store documents in repositories other than PROxI. We observed that other repositories continue to be used in the Office: namely, the C:, H:, I:, O:, and S: (read-only) drives. While valid reasons exist for a need for additional storage, such as non-compatibility with PROxI, some of these documents should be stored in PROxI.

13. Government policy requires that a mechanism be in place to support recordkeeping requirements throughout the life cycle of a document, including disposal. Also, there is a requirement that information be shared within the Office. Effective sharing of information is based on access, location of information, naming conventions, and search capabilities. Without a consistent approach to profiling electronic objects within PROxI, the IM team may not be able to apply automated disposition activities to dispose of documents.

14. In our opinion, monitoring the use of the PROxI system and other repositories would allow the IM team to

- confirm the effectiveness of the system;
- identify the nature and extent of training needed; and
- identify desirable changes to policies, guidance, and manuals.

As improvements are noted, ongoing monitoring can be revised to target particular areas of concern.

15. In summary. We found that given the lack of monitoring, the Office does not have assurance regarding the appropriate use of and controls for PROxI.

16. Recommendation. The Office should implement monitoring as a repeatable business process to obtain assurance that the electronic document and records management system is being used as intended and is fulfilling the Office's obligations for records management. Monitoring should consider such things as access rights, location of information, naming conventions, security level, and capacity.

Management response. *Agreed. The information management team has developed a standard monitoring plan that, at a minimum, includes access rights, document classification, naming conventions, and security level. It examines PROxI usage from different facets (for example, the file plan or group usage) and will be repeated no less than annually. The monitoring plan development has been completed, and monitoring has begun. If any new items arise that need to be consistently monitored, they will be added to this plan. The activity Monitoring has been added under the Knowledge and Information Management function in PROxI so that in future, all documentation of monitoring will be captured under a single place in the file plan. In addition, the Access to Information and Privacy (ATIP) Coordinator will periodically monitor the system to ensure that personal information is not being inadvertently exposed. System-generated reports will be reviewed for usefulness and accuracy, and modifications made as needed.*

No evidence indicates that senior management is receiving information for oversight

17. Providing senior management with periodic reports on the results of key metrics enables management to assess whether the electronic document and records management system (EDRMS) is being used effectively and whether the Office is meeting its IM policy requirements. Because these reports become the basis for sound decision making, we expected to find that they are presented to the Office's senior management on a regular basis.

18. We found no evidence that any monitoring results were presented to the Chief Information Officer (CIO), the Assistant Auditor General of Corporate Services, or the Executive Committee. We reviewed and analyzed interview responses, email responses, the Office's INTRAnet site, and documents provided by the Office's IM and information technology (IT) group, but found no documents in support of this audit question. In the absence of briefings, reports, and recommendations to the Office's senior management, it is unclear how the Office is meeting its legislative responsibilities in relation to Government of Canada policies, standards, guidelines, and directives.

19. Our concerns relate to two levels of senior management: the CIO, who has direct responsibility for information management, and the Executive

Committee or other body that has responsibility for general oversight. For example, the Executive Committee is responsible for, among other things, establishing policies and principles for managing people and products, and for determining the allocation of resources. To perform these two responsibilities, it must be informed. Monitoring reports would support this need. The CIO has many responsibilities related to IM. Also, the CIO's strategic plan identifies a vision, a mission, and goals. Without monitoring, the CIO lacks tangible evidence that IM is in line with policy and Office objectives.

20. In summary. We found that monitoring results have not been presented to senior management to allow decisions and decision-making processes to be accounted for and supported, in keeping with policy requirements.

21. Recommendation. The Office senior management should receive ongoing monitoring reports and analysis that explain whether and how the Office is meeting its information management (IM) requirements. These monitoring reports should be used to assist in making decisions pertaining to any required changes to IM policies and system revisions.

Management response. *Agreed. The information management team will submit a monthly report to the Chief Information Officer and to the Chief Financial Officer, who is a member of the executive team. The report will include statistics on PROxI usage and a summary of the month's monitoring activities.*

PROxI implementation and use

22. PROxI was and is intended to be the repository of all records of business value. Fundamental characteristics of a strong electronic document and records management system (EDRMS) include ownership, filing and description, organization, access and protection, storage and retention, and disposal. In addition to meeting the technical requirements of the system, how it was set up and how it is being used greatly affect all of these key characteristics. We expected to see evidence that the Office had analyzed whether the implementation and ongoing use of PROxI needed improvement.

23. We reviewed and analyzed documents provided by the Office information management (IM) and information technology (IT) groups to determine whether any gaps in PROxI implementation had been identified. We also interviewed key IT/IM staff and received email responses to specific questions.

Shortcomings exist in the implementation and use of PROxI

24. We found that formal measurement of progress, as well as user engagement and feedback activities, was done in 2010 as part of an annual review of PROxI. In 2012, another smaller analysis was conducted. Since 2012, no further user consultation or feedback sessions have taken place.

25. The 2010 report identified that, among other things, the following areas required attention: access rights and the need for monitoring to better understand user challenges. The 2012 analysis called for a comprehensive review of the Office's information architecture. Both reviews identified usage concerns and the need for additional training to support better implementation.

26. We found no evidence to identify actions taken in response to these analyses. As noted earlier in this report, no regular monitoring activities are in place. We found no comprehensive review of the information architecture, as recommended in 2012. We saw no evidence of changes to course content, as recommended in 2010. While training is available for new employees, it is not mandatory.

27. An implementation gap identified by internal audit is the use of unmanaged repositories, which continue to be used even though PROxI has been in place for over five years. At present, an Office-specific plan that would consider business requirements and user functionality enhancements does not exist. Instead of Office-specific solutions, the Office is relying on vendor-supplied technical solutions.

28. **In summary.** We found that there are gaps in the PROxI system use and implementation.

29. **Recommendation.** The Office should conduct a review to identify gaps in current PROxI use and also in the document repository. Improvements should be identified and should be linked to measures so that ongoing monitoring can be conducted to demonstrate progress.

Management response. *Agreed.*

- *The monitoring process that has been recently implemented will identify areas of the file plan requiring modifications.*
- *A review similar to the one carried out in 2010 should be conducted; given the information management (IM) team's priorities for 2014, this review may not be done until 2015.*
- *The IM team is aware of gaps in IM awareness and will embark on a campaign to ensure that all employees are aware of their responsibilities and have the tools to fulfill them.*
- *With the I: drive under control and managed, the IM team will start a review of the O: and S: drives. The business needs to use alternate drives will be substantiated and documented, so that they could be considered in future system improvements.*

Governance structure

30. According to *Optimum: The Journal of Public Sector Management*, "the goal of effective IM/IT Governance is to ensure that all IM/IT initiatives have been managed from an organization-wide perspective and that they contribute to the institution's strategic business goals." This journal also defines three elements in an information management and information technology (IM/IT) governance framework (Exhibit 1).

Exhibit 1 Elements of an IM/IT governance framework

Governance principles	The principles by which all IM/IT initiatives will be governed.
Governance structure	The roles and responsibilities of the major stakeholder in the IM/IT governance decision-making process, including committees and organizational elements at the branch level.
Governance process	The various stages required to review, assess and approve or reject new IM/IT initiatives.

Source: *Optimum: The Journal of Public Sector Management*, Vol. 29, Nos. 2/3.

31. We examined whether an adequate governance structure exists for the IM function and system implementation. We reviewed and analyzed documents provided by the Office IM and IT groups. Also, we received email responses to specific questions and searched the Office INTRAnet for policies to supplement the information we received.

A weak governance structure exists

32. We found that there is a lack of precision regarding roles, responsibilities, and expectations for the frequency and timeliness of governance activities. The IM policies contained within the policy suite were approved in 2009 and were to have been reviewed in 2011, but this review was not done. Few roles are identified through policies or job descriptions, making it difficult to determine who is tasked with which responsibilities.

33. The policy suite available to employees through the corporate INTRAnet site is limited. No specific policy instruments outline internal controls, roles, standards, policies, guidelines, directives, and best practices for the entire IM program. Items such as metadata, social networks, and email, for example, require documented procedures, standards, and guidelines. Likewise, roles and responsibilities for key activities such as system monitoring are not clearly identified. The risk is that when activities are not clearly documented, they may not take place, or may take place in a manner that is not consistent with the expectations of senior management.

34. The INTRAnet information in IM and PROxI Best Practices within the IM policy suite is a good foundation and reference point for users. However, the guidance requires more context and is outdated. As an example, the IM Do's and Don'ts section does not include any rationale for the guidance and does not outline the potential consequence for not adhering to corporate guidelines. It appears that this INTRAnet page was last modified in 2010.

35. In summary. We found that the IM policy suite and governance framework is insufficient to achieve mature and sustainable corporate IM systems.

36. Recommendation. The Office should update its information management policies and create job descriptions to identify clear roles and responsibilities, set expectations of employees that link to the policy requirements, and establish timelines for updating these policies. A mechanism should be included to ensure that the Office is able to monitor adherence to these policies.

Management response. *Agreed. The information management (IM) policy will be rewritten to clarify the new accountability roles and responsibilities. The IM team just completed an organizational review resulting in new job descriptions.*

Conclusion

37. Based on our observations and findings, we concluded that the Office of the Auditor General is not effectively monitoring the use and implementation of PROxI, its electronic document and records management system for non-audit records. As a result, the Office cannot assess the extent to which it is meeting its document management requirements. We concluded that there are gaps in the Office's information management policy suite and in PROxI use, in addition to the lack of monitoring and lack of reporting to support senior management's oversight.

About the Internal Audit

Practice Review and Internal Audit (PRIA) provides the Auditor General with independent and objective information, advice, as well as consulting and assurance services, to add value and improve audit practices and Office operations, through learning and continuous improvement.

As part of our internal audit process, we obtained management's confirmation that the findings reported in this document are factually based.

Objectives

The objective of the internal audit was to determine whether the Office of the Auditor General is meeting its document management requirements through use and implementation of its information management system.

Scope

We focused our internal audit on areas of the Office responsible for the development, implementation, and maintenance of the PROxI system, in particular the information management (IM) and the information technology (IT) areas that deal with information management.

Criteria

Criteria	Sources
Deputy heads are responsible for . . . establishing, measuring, and reporting on a departmental program or strategy for the improvement of the management of information.	Policy on Information Management, Treasury Board of Canada Secretariat

Audit questions and approach

To address the internal audit criteria, we posed the following audit questions.

Audit questions	Type of work to be done
1. Is there an effective governance structure in place for information management (IM) systems?	Review of internal services governance structure over IM function and system implementation.

Audit questions	Type of work to be done
2. Were there gaps in the PROxI system implementation?	Review of key foundational documents surrounding system implementation, including (but not limited to) • past assessments (formal or informal) • relevant business cases and briefing notes • relevant investment requests (memos, etc.) • project plans, deliverable statements, slide presentations • user satisfaction consultations • future development/investment roadmaps
3. a) Has the Office put in place procedures consistent with good practices to monitor the implementation of its electronic records and document management system? Are these procedures being effectively implemented? b) If not, develop case examples to demonstrate issues. These examples need not be all-inclusive. (If necessary to be conducted, this work is to be done by the Office's staff.)	Review of any available metrics related to system utilization, including reports on • repository holdings • numbers of documents • sharing of documents (through link) • accessing of documents • versioning and finalization of documents • number of user accounts • administrative logging • audit logging • user interactions • disposition activities • retention activities • individual user document counts (authored) • authentication records (logins and logouts) • what is being captured (information types) • what is not being captured (alternative storage)
4. Have the monitoring results been presented to senior management to allow decisions and decision-making processes to be accounted for and supported per policy requirement?	Review of any past or present reports that have been used to influence or guide ongoing investment (human or financial).

In addition, we interviewed key personnel to confirm or increase our understanding of the facts.

Management reviewed and accepted the suitability of the criteria used in the internal audit.

Period covered by the audit

The internal audit covered the period between 1 January 2013 and 31 December 2013. Some information, particularly related to question 2, was from before the period under audit. Internal audit work for this report was completed on 8 April 2014.

Internal audit team

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